

# Shellfish Connections

A Newsletter  
from  
The Office of Food Safety & Shellfish Programs

April 2003

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## GROWING AREA NEWS

### What is a Shoreline Survey?

A shoreline survey is an integral part of the classification of all shellfish growing areas. The shoreline survey process identifies and evaluates all actual and potential pollution sources that may adversely affect a growing area. Thorough, in-depth appraisals of all classified growing areas must be completed a minimum of once every 12 years. Limited assessments and reviews are then completed every 3 years.

A shoreline survey consists of a three-phase approach:

**Evaluation of the shoreline area:** This includes: 1) the identification and evaluation of all streams, creeks, beach seepages and stormwater discharges to the marine environment; and 2) the assessment of marinas, industrial discharges and wastewater treatment plants. Separate evaluations and reports are typically completed for the latter.



**Evaluation of the developed shoreline:** This assessment includes a site-by-site evaluation of the activities occurring on all developed shoreline parcels. The primary focus is on the method of sewage disposal used, operation and maintenance of on-site sewage systems, and soil conditions within the surrounding area. Agricultural areas are evaluated to determine the number and type of animals, the condition of the pasture area, and animal access to surface water.

**Evaluation of the watershed:** This includes the evaluation of all upland activities and how area topography, natural drainageways, and stormwater conveyance systems might impact a growing area. Wildlife, agricultural activities, potential and actual urban sprawl, and other sources are evaluated.

During 2002, the Department surveyed 1,041 developed parcels and 513 drainageways and discharge points along 142 marine shoreline miles. The surveys were completed within all or portions of the following shoreline areas:

Bruceport	Dabob Bay	Drayton Passage
Dyes Inlet (E. Erlands Point)	Hood Canal 1	Hood Canal 2
Hood Canal 5	Hood Canal 6	Mackaye Harbor
Mats Mats Bay	Penrose Point State Park	Pickering Passage
Samish Bay	Stretch Island	Wyckoff Shoal (McNeil Island)

During 2003, the shoreline survey team will evaluate the conditions around 11 classified growing areas and 5 newly requested areas. Look for the survey team along the shoreline of the following growing areas:

Blake Island	Discovery Bay	Eld Inlet
Nemah	North Bay	Oakland Bay
Port Gamble	Quartermaster Harbor	Skookum Inlet
Stony Point		

If you would like copies of the shoreline survey for a specific growing area, please contact Scott Berbells at (360) 236-3324 or e-mail [scott.berbells@doh.wa.gov](mailto:scott.berbells@doh.wa.gov).

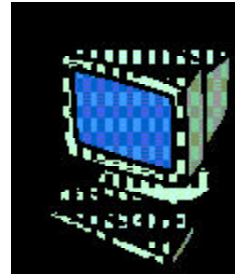
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## GROWING AREA NEWS *(continued)*

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### Growing Area Closure Notification System

As many of you are aware, our office periodically closes growing areas due to temporary circumstances. Temporary closures can be triggered by biotoxins, rainfall in conditional areas, seasonal marina usage, spills, vibrio, etc. We're working to make it easier for you to keep track of these closures. Starting in May, we will be sending closure notifications by e-mail whenever a closure event occurs. To be added to the distribution list for these closure reports, send an e-mail to [becky.egolf@doh.wa.gov](mailto:becky.egolf@doh.wa.gov). Once your e-mail address is added to the list, you must be sure to monitor your e-mail closely, as closures can change daily. Sorry, we will not be sending the reports by postal mail, but you can always call the office at 360-236-3330 to get information on current closures.




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## OTHER NEWS

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### California Bans Sale of Raw Gulf State Oysters April-October

California enacted an emergency regulation on April 14, 2003 that limits the sale of oysters originating from the Gulf of Mexico. The regulation bans the sale of raw oysters harvested from gulf waters April through October each year unless the shellstock has undergone post-harvest treatment to reduce levels of *Vibrio vulnificus* to non-detectable levels. Shucked product can be sold during this time frame if a "cooking only" label is affixed to each container. The emergency regulation was enacted to decrease illnesses and deaths in at-risk persons in California who eat raw oysters contaminated with *Vibrio vulnificus* bacteria.



### A Message from Jessie DeLoach, Manager, Licensing and Certification Section



In November 2002, I assumed my new role as Manager of the Licensing and Certification section. I would like to take a moment to acknowledge all the licensed shellfish companies who have made tremendous effort in complying with the multitude of Model Ordinance (HACCP & SSOP) and Washington Administrative Code requirements for shellfish operations. As the previous Lead Inspector for the Shellfish program, I appreciate your efforts in working with your inspectors and maintaining compliance to the Model Ordinance requirements. You can be proud of the hard work you have accomplished thus far and for work you continue to do. We're proud of you too.

As the new Licensing and Certification Manager, I ask for your continued support in our joint efforts in providing compliance to both department and NSSP Model Ordinance requirements. My staff and I will continue to do our utmost in providing you with the best technical assistance possible to help you in complying with interstate and intrastate commerce requirements.

It is our intent and desire to provide fair, timely, and accurate regulatory guidance to you. I look forward to our continued positive relationships. Thanks,

Jessie DeLoach

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## INSPECTORS' CORNER

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### Enforcement Update

*Recent license actions and civil penalties (these items will be updated as they proceed)*

*Barclay Seafoods Company, Owner Chi-Tai Kuo*

Notice of Intent to charge civil penalties in the amount of \$250.00 was mailed on March 26, 2003. Alleged violation includes failing to maintain mandatory, verified HACCP monitoring records. This action is a result of failing to abide by the required recordkeeping requirements stemming from a previously issued Notice of Correction and a recent on-site inspection. The \$250.00 civil penalty was paid on April 14, 2003.

### Update on License Fee Restructure

Last year during the PSP fee implementation process, we heard from many of you through the workshop and public hearing that the current license fee structure presents an undue burden on small companies. At that time, we promised to look into ways to restructure the license fees to be more in line with a company's size. Last fall we announced the formation of a workgroup for this purpose, and invited industry members to participate in the process. (See article in September's issue of *Shellfish Connections*.) This workgroup, formed of those who volunteered and several members of our staff, met in November, January, and February to discuss options for a new license fee structure.

The workgroup felt the most equitable way to assess license fees would be to base a portion of those fees on the amount of acreage listed on each company's harvest site certificate. The difficulty they faced in this approach was the lack of accurate harvest acreage information currently on file with our office. In light of this, the workgroup felt

the best path was to table further discussion until acreages on active harvest sites had been gathered.

Our office will be requesting this information from each shellfish company in the near future. We will ask you to look at each of your harvest sites and provide us with acreage based on specific criteria and measurement methods. When you receive this request, we ask that you provide us with the information as soon as possible. Once harvest site acreages have been collected, the workgroup will reconvene to develop a revised license fee structure to present to all industry members for comment. As with the PSP structure process, a workshop will be held in which all members of the industry will be invited to participate to provide suggestions and feedback to the proposals outlined by the workgroup.

If you have questions regarding this process, please contact Jennifer Tebaldi at (360) 236-3325 or e-mail [jennifer.tebaldi@doh.wa.gov](mailto:jennifer.tebaldi@doh.wa.gov).

### Export Certificate Workshop Held

Our office held an Export Certificate workshop on March 5, 2003. Shellfish dealers who are exporting to Asian countries were invited to participate. Several company representatives attended this workshop to review current recordkeeping concerns, policy expectations, and to provide suggestions for improvement. Attention was given to the accurate and timely issuance of these certificates. A follow-up workshop is scheduled for June 11, 2003 at our office in Tumwater. If you are interesting in attending this next workshop please contact Michalene Fontana, Export Certificate Coordinator, at (360) 236-3330 or e-mail [michalene.fontana@doh.wa.gov](mailto:michalene.fontana@doh.wa.gov).



### Tagging & Recordkeeping Concerns

In our last newsletter we addressed the importance of using the growing area name and a specific harvest site identifier, as listed on your Harvest Site Certificate (HSC), on tags and records. This article generated a number of calls and questions from industry members, many of whom expressed concern regarding recognizable site identifiers on tags.

The problem DOH is facing is that the wide range of tagging and recordkeeping methods currently used by the industry do not directly cross-reference to the HSC. Internal coded bed numbers, names, or other references listed on tags and other records can obscure product source identification, limiting DOH's ability to quickly respond to product recalls or

*continued on page 5*



## INSPECTORS' CORNER (continued)

closure events. This can potentially delay interstate shellstock shipments, cause the destruction of product with unidentified sources, or cause the closure of an entire growing area instead of a portion of it.

However, we know that there are concerns regarding recognizable site identifiers. If you prefer, you can assign a unique, specific “site identifier” code (site ID), such as a number, letter, or name designator for each harvest site on your HSC. Incorporating a site ID into your Harvest Site Certificate would keep easily recognizable identifiers such as parcel numbers, bed numbers, lease numbers, owner names, etc., off your tags, and still allow DOH to quickly cross reference the site ID to a specific harvest site (see examples below).

With this in mind, the required information on tags and records, as specified in our last newsletter, is amended as follows: Please make sure the information listed on your tags includes the NSSP growing area name, **and at least one** of the following specific harvest site identifiers from your HSC:

- site ID as listed on your HSC
- parcel number
- bed number
- BIDN
- geoduck tract number
- legal owner's last name
- DNR lease number

*Examples of Site IDs. These could be numbers, letters, or a combination of both.*

**Harvest Site Certificate**

Company Name:    Example Shellfish Company  
 License End Date: 9/30/2004  
 License Number:    WA-9999-SS

Site ID/ Relay	NSSP Growing Area	Station #	Harvest Site Owner/Address	Site Number	Acres	Cert. Date	Lease Expires	Relay Permit on File	Signed CAAMP on File
	Hood Canal #1	16, 17	John Doe	Parcel: 09865	1.25	1/1/99	12/31/04	N/A	N/A
HC1-A		Beleulah Point							
	West Straits	151	Joe Nobody	Parcel: XYZ	5.5	6/7/96	6/6/06	N/A	N/A
1234ABC		Exemplary Harbor							

### Tag Example

XYZ SHELLFISH COMPANY  
1234 Any Street  
Your Town, WA 90000

ORIGINAL SHIPPER'S CERT NO. (if other than above):

HARVEST DATE: 2/28/03

SHIPPING DATE: 3/1/03

HARVEST LOCATION: Hood Canal #1 - Parcel 09865 (or) Hood Canal #1 - HC1-A

TYPE OF SHELLFISH: Pacific Oyster

QUANTITY OF SHELLFISH:	20	BUSHELS	COUNT
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POUNDS	OTHER
1	1
2	2
3	3
4	4
5	5
6	6
7	7
8	8
9	9
10	10
11	11
12	12
13	13
14	14
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99	99
100	100

THIS TAG IS REQUIRED TO BE ATTACHED UNTIL CONTAINER IS EMPTY AND THEREAFTER KEPT ON FILE FOR 90 DAYS.

TO:

RESHIPPER'S  
CERT. NO.

DATE RESHIPED

If you are interested in using a site ID on your records, please contact our office at (360) 236-3330. We will work with you to incorporate that information into your Harvest Site Certificate.

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## BIOTOXIN UPDATE

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### Domoic Acid

The domoic acid levels in razor clams for the first quarter of 2003 continued downward, following the trend from December 2002. However, levels were still above the closure level of 20ppm, keeping the recreational razor clam season closed on the coast. The only bright spot was 2 of the 3 razor clam samples collected on March 31, 2003 from Long Beach tested 19ppm. The third sample in the Long Beach set had a test result of 21ppm, high enough to keep Long Beach closed. Plankton monitoring revealed almost no *Pseudo-nitzschia* cells present in the water. *(Editor's note: April monitoring has revealed an upswing in Domoic Acid levels, decreasing the chance of a spring opening for recreational razor clam harvest.)*

Elevated Domoic acid results in Dungeness Crab prompted the department to increase sampling to weekly. On February 7, 2003, DOH closed all crab harvesting in Willapa Bay, where crab samples reached levels as high as 60ppm. On February 21, after more sampling in Willapa Bay, the department reopened the southern half of Willapa Bay to crab harvesting. *(Editor's note: the northern half of Willapa Bay was reopened to crab harvest on 4/25/03.)*

### PSP

PSP toxin levels followed the typical pattern for the first quarter of the year, with downward trends throughout the state, followed by area closures being lifted. In Puget Sound, general closures were lifted in Jefferson, King, Kitsap, Mason, Pierce and Skagit Counties.

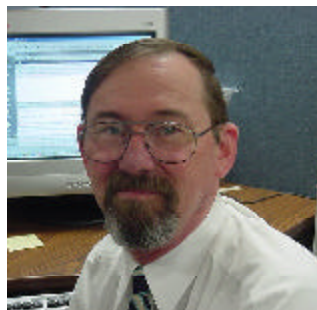
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## STAFF CHANGES

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### New Lead Inspector / State Standardization Officer Hired

Richard Lillie recently joined our staff as our new Lead Inspector. He will also be our State Standardization Officer (SSO) once he completes the FDA's comprehensive standardization training course. Richard's duties will include FDA audit compliance, inspector standardization, plant standardization, ISSC issue coordination, and HACCP training. Richard comes to us from the USDA's Food Safety & Inspection Service with a Masters in public health, and extensive training and experience in public health compliance and food safety issues. Welcome to the team, Richard!



### New Tribal Coordinator Selected

Helen Seyferlich has been selected to serve as the new Tribal Liaison/Coordinator for our office, filling the vacancy left by Stan Iwagoshi since his departure early last year. Helen will serve as both coordinator for tribal quarterly meetings and liaison for tribal compliance with the NSSP Model Ordinance. She will also continue in her current role as lead for harvest site certification. Helen has a wealth of knowledge in public health, licensing and inspection requirements, and harvest site approval processes. Congratulations Helen, on your new role!





**Staff Contacts**

*Office Director*

Jennifer Tebaldi ..... (360) 236-3325

*Classification/Water Quality*

Bob Woolrich ..... (360) 236-3329

*Licensing & Certification*

Jessie DeLoach ..... (360) 236-3302

*Biotoxins*

Dave Gifford ..... (360) 236-3074

**Other Numbers**

General Information ..... (360) 236-3330

FAX (360) 236-2257

Web site ..... [www.doh.wa.gov/ehp/sf](http://www.doh.wa.gov/ehp/sf)

**Biotoxin Closures**

PSP Hotline ..... (800) 562-5632

PSP Web ..... [www.doh.wa.gov/ehp/sf/biotoxin.htm](http://www.doh.wa.gov/ehp/sf/biotoxin.htm)

All DOH staff e-mail addresses follow this format: [firstname.lastname@doh.wa.gov](mailto:firstname.lastname@doh.wa.gov)

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